## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

RICHARD GRAHAM,		)
	Plaintiff,	)
		) Civil Action No.: 3:24-cv-5817-SAL
TRUIST BANK,	Defendant.	) ) )

## TRUIST BANK'S UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

COMES NOW Defendant Truist Bank ("Truist"), and respectfully moves this Court for an extension of time to file a responsive pleading to the Complaint ("Complaint") filed by Plaintiff Richard Graham ("Plaintiff"). As grounds for this Motion, Truist states as follows:

- 1. Plaintiff commenced this action on or about September 10, 2024.
- 2. This matter was removed to this Court on October 11, 2024 (Doc. 1), thus the deadline to file a responsive pleading is October 18, 2024.
- 3. Counsel for Truist has conferred with counsel for Plaintiff regarding an extension of time of fourteen (14) days to file a responsive pleading. Counsel for Plaintiff has consented to the extension. As such, no party will be prejudiced by the Court granting this Motion.

WHEREFORE, PREMISES CONSIDERED Defendant Truist Bank respectfully requests that the Court grant this unopposed motion and extend the time in which it has to file a responsive pleading from October 18, 2024 to November 1, 2024.

Dated October 15, 2024.

Respectfully submitted,

/s/Richard C. Keller
Richard C. Keller SC Bar No. 74094
rkeller@burr.com
BURR & FORMAN, LLP
420 North 20th Street, Suite 3400
Birmingham, AL 35203
Telephone: (205) 251-3000
Facsimile: (205) 458-5100

ATTORNEY FOR DEFENDANT TRUIST BANK

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document by Notice of Electronic Filing, or, if the party served does not participate in Notice of Electronic Filing, by U.S. First Class Mail, hand delivery, fax or email on this the 15th day of October, 2024:

Dave Maxfield, Esq. P.O. Box 11865 Columbia, SC 29211 dave@consumerlawsc.com Counsel for Plaintiff

> /s/ Richard C. Keller Richard C. Keller Of Counsel